



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

CRH/JMH/EHS  
F. #2017R00906

*271 Cadman Plaza East  
Brooklyn, New York 11201*

December 3, 2021

By Email and USAFx

Paul A. Goldberger  
Renee Melinda Wong  
c/o Goldberger & Dubin PC  
401 Broadway, Suite 306  
New York, New York 10013

Re: United States v. Congying Zheng  
Criminal Docket No. 21-265 (PKC)

Dear Counsel:

Enclosed please find the following additional materials, which are being produced in accordance with the government's discovery obligations:

Description	Begin Bates	End Bates
Interview of co-conspirator, dated April 12, 2017	CZ-004188	CZ-004189
Interview of co-conspirator, dated November 9, 2017	CZ-004190	CZ-004204
Interview of co-conspirator, dated June 21, 2018	CZ-004205	CZ-004206
Google data and records	CZ-004207	CZ-004207
Apple iCloud data and records <sup>1</sup>	CZ-004208	CZ-004208

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<sup>1</sup> Some of this data has been previously produced to you, and is being reproduced for your convenience.

Due to the volume of data, we will be producing a portion of these materials via hard drive through the mail.

The materials are being provided subject to the protective order agreed to by the parties and entered by the Court on June 18, 2021. See ECF No. 70 (“the Protective Order”). The government considers all of the materials produced today to constitute “sensitive discovery material” as that term is defined in the Protective Order, and has identified such materials accordingly. See Protective Order ¶¶ 7-9. The government reiterates its request for reciprocal discovery from the defendant.

Very truly yours,

BREON PEACE  
United States Attorney

By: /s/ Craig R. Heeren  
Craig R. Heeren  
J. Matthew Haggans  
Ellen H. Sise  
Assistant U.S. Attorneys  
(718) 254-7000

Enclosures (via USAFx)

cc: Clerk of the Court (PKC) (by ECF) (without enclosures)